

WESTERN WIRELESS (AN ETC IN MANY RURAL LEC SERVICE AREAS) APPEARS TO BE DISGUIISING IT'S TRAFFIC TO AVOID COMPENSATION LIABILITIES – IF THIS PROVES TO BE THE CASE, WESTERN'S ETC STATUS SHOULD BE REVOKED

- On November 30, 2001 Western Wireless was granted designation as an Eligible Telecommunications Carrier (ETC) in certain areas served by rural local telephone companies in Kansas.
- The record reflects that even though Western Wireless has been granted ETC status for the rural LEC service area, the volume of minutes that Western terminates to one of the rural LEC end users began to decline from roughly 45,000 a month in August 2002 and completely disappeared by early October 2002.

Company	Terminating Carrier	Beginning Usage Date	Ending Usage Date	Term MOU
Rural LEC	Western Wireless	05-Aug-01	04-Sep-01	46,034
Rural LEC	Western Wireless	05-Sep-01	04-Oct-01	40,148
Rural LEC	Western Wireless	05-Oct-01	04-Nov-01	42,201
Rural LEC	Western Wireless	05-Nov-01	04-Dec-01	39,817
Rural LEC	Western Wireless	05-Dec-01	04-Jan-02	39,382
Rural LEC	Western Wireless	05-Jan-02	04-Feb-02	41,906
Rural LEC	Western Wireless	05-Feb-02	04-Mar-02	38,763
Rural LEC	Western Wireless	05-Mar-02	04-Apr-02	39,293
Rural LEC	Western Wireless	05-Apr-02	04-May-02	32,198
Rural LEC	Western Wireless	05-May-02	04-Jun-02	40,371
Rural LEC	Western Wireless	05-Jun-02	04-Jul-02	45,034
Rural LEC	Western Wireless	05-Jul-02	04-Aug-02	45,392
Rural LEC	Western Wireless	05-Aug-02	04-Sep-02	5,759
Rural LEC	Western Wireless	05-Sep-02	04-Oct-02	940
Rural LEC	Western Wireless	05-Oct-02	PRESENT	0

- The rural LEC has not yet ascertained where and/or why the wireless minutes that Western Wireless was delivering to it have ceased, but it does not appear to be a name change issue. It seems very unlikely that if Western Wireless is actually providing service in the rural LEC service area (as is required to obtain ETC status) that traffic from Western Wireless terminating to landline end users in the rural LEC service area would actually decline to zero.
- It seems possible that Western Wireless has either found some means of hiding it's identity as the originating carrier so as to avoid compensation responsibilities and/or is really not providing service in the rural area in which it has been granted ETC status.
- Western's ETC status should be revoked if (a) it is determined that they are intentionally altering the record process to hide their identity as the originating carrier responsible for compensation or (b) it is found that they are no longer providing service in the areas for which they were granted ETC status.